



October 17, 2008

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Dear Tom:

I assume it's not too late to comment on the Urban Water Use Efficiency Pre-Admin Draft, since the draft did not appear on DWR's website until October 14 and further "big" changes to the document are still expected prior to the Public Review Draft.

Here are my thoughts:

- I noticed a factual error in the first paragraph on page 7. A sentence in that paragraph states that the AB 2717 Landscape Task Force adopted a comprehensive set of 43 recommendations to updating the AB 325 Model Local [sic] Water Efficient Landscape Ordinance." Actually, less than half of the task force's 43 recommendations deal with updates to the Model Water Efficient Landscape Ordinance or are in any way related to it.
- The section on New Opportunities and Technology on Page 9 seems weak to me. There is very little in this section about technology. And most of the "opportunities" are not new. For example, the opportunity to eliminate the flow of urban runoff and contaminants to the watershed has been there for a long time.
- The last three paragraphs in the Environmental Justice section at the bottom of Page 12 and the top of Page 13 didn't seem like they belonged in that section.
- The paragraph on Education and Motivation on page 16 struck me as incomplete. It's mostly an appeal for more research. But what about the need for more education on the need to use water more efficiently and how to do it? I suggest that this section give examples of existing successful programs that educate the public and/or needs that could be addressed by future educational or training programs.
- I suggest that the Recommendations to Achieve Additional Urban Water Use Efficiency mention the need to encourage education, training, and certification programs for landscape water managers. This would be especially appropriate under "Develop collaborative efforts" on page 18.

One prominent example of such a program is the California Landscape Contractors Association's Water Management Certification Program. We created this innovative program in response to an AB 2717 Landscape Task Force recommendation and in cooperation with California's urban water agencies. It certifies landscape water managers who pass a written test and irrigate a project below an assigned water budget for a 12-month period. (See our website for more information at <http://www.clca.us/water/>.) Public agencies can help this program by promoting it and referring property owners to lists of certified individuals.

I suppose it could be argued that landscape education, training, and certification programs could fall under "work with property owners and landscape managers

to increase water use efficiency in large landscapes,” the second bullet item under “Develop collaborative efforts.” However, I think it would be preferable to mention explicitly the need to support certification programs for landscape professionals, especially in consideration of the fact that the AB 2717 Landscape Task Force made several recommendations dealing with them. It also occurred to me that if the document mentions the GreenPlumbers certification program by name, as it does on page 18, it probably should mention our Water Management Certification Program as well.

- I like the recommendation to “develop and implement rate structures that encourage water use efficiency” on page 17. But I would like to know what the state of California actually plans to do to encourage them!

Thank you for giving me the opportunity to make these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Larry', with a large, stylized flourish extending from the end of the signature.

LARRY ROHLFES, CAE  
Assistant Executive Director

cc: CLCA Resource Management Committee  
CLCA Executive Director Sharon McGuire